

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
JARED L. GRIMMER
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336/Fax: (702) 388-6418
jared.l.grimmer@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

FERNANDO PEREZ-LLAMAS,
aka "Luis Fernando Perez,"
aka "Luis Perez-Llamas,"
aka "Luis Fernando Perez-Llamas,"
aka "Osvaldo Torres-Panduro,"

Defendant.

Case No. 2:22-mj-00387-NJK

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Raquel Lazo, Assistant Federal Public Defender, counsel for Defendant FERNANDO PEREZ-LLAMAS, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.

8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 18th day of May, 2022.

15 Respectfully Submitted,

16 RENE L. VALLADARES
17 Federal Public Defender

JASON M. FRIERSON
United States Attorney

18 /s/ Raquel Lazo
19 RAQUEL LAZO
20 Assistant Federal Public Defender
21 Counsel for Defendant FERNANDO
22 PEREZ-LLAMAS
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24

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 FERNANDO PEREZ-LLAMAS,
7 aka "Luis Fernando Perez,"
8 aka "Luis Perez-Llamas,"
9 aka "Luis Fernando Perez-Llamas,"
10 aka "Osvaldo Torres-Panduro,"

11 Defendant.

Case No. 2:22-mj-00387-NJK

**Order Directing Probation to
Prepare a Criminal History Report**

12 Based on the stipulation of counsel, good cause appearing, and the best interest of
13 justice being served:

14 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
15 report detailing the defendant's criminal history.

16 DATED this 18th day of May, 2022.

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18 NANCY J. KOPPE
19 UNITED STATES MAGISTRATE JUDGE
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